

THE CITY OF NEW YORK LAW DEPARTMENT

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February 25, 2025

VIA ECF

The Honorable Andrew L. Carter, Jr. United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

> Re: Paul Phillips, et. al. v. The City of New York, et. al., 21 Civ. 8149 (ALC)(SLC)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants in the above referenced matter. We write with the consent of plaintiffs' counsel to respectfully request that defendants' time to file a reply brief in support of their motion to dismiss be extended from March 3, 2025 until April 4, 2025. The principal reason for the request is that the additional time is necessary to fully reply to plaintiffs' response, and that I was out on medical leave with a significant medical issue for most of December-January, causing a backlog of a multitude of other case related deadlines that I have had to meet upon my return. This is the first request for an extension of time.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman Mark D. Zuckerman

All counsel (via ECF) cc: